MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal	Plaintiffs' Executive Committee for
Injury and Death Claims	Commercial Claims
Ronald L. Motley (1944-2013)	Stephen A. Cozen, Co-Chair
Jodi Westbrook Flowers, Co-Chair	Sean Carter, Co-Chair
Donald A. Migliori, <i>Co-Chair</i>	J. Scott Tarbutton, Liaison Counsel
Robert T. Haefele, Liaison Counsel	Cozen O'Connor
MOTLEY RICE LLC	

VIA ECF

June 18, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge United States District Court for the S.D.N.Y. Thurgood Marshall U.S. Courthouse, Room 430 40 Foley Square New York, NY 10007

Re: In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

As set forth in their June 7, 2024 letter to Hon. Judge Daniels, ECF No. 9885 at 3-4, the Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs ("Plaintiffs") are continuing to file publicly (with redactions where appropriate) the judicial documents as to which the meet-and-confer process with all parties has been completed, and which are listed on Plaintiffs' "Schedule of Judicial Documents cleared for Public Filing". ECF No. 9885-1.

Pursuant to this Court's June 17, 2024 Order regarding the efficient filing of (and public access to) digital media files, ECF No. 9923, Plaintiffs are today filing on the public docket the following exhibits that comprise digital media on DVDs:

Pls. Exhibit No.	Bates / Production No.
Pls. Ex. 10E	MPS902-CLIP
Pls. Ex. 10F (errata version)	MPS2023-003_upd
Pls. Ex. 10G	MPS906-CLIP
Pls. Ex. 10H	MPS896-CLIP
Pls. Ex. 10K	MPS2023-059

Certain images contained in these exhibits have been provisionally redacted, as agreed between the parties, ¹ to obscure the faces of individuals who were minors at the time.

_

¹ In the exhibits "Pls. Ex. 10F_ppr", "Pls. Ex. 10H_ppr" and "Pls. Ex. 10K_ppr", Plaintiffs have obscured the faces of minors, while no redactions were required in the exhibits "Pls. Ex. 10E_ppr", "Pls. Ex. 10G_ppr", which have been filed in unredacted form. Plaintiffs' judicial documents that include Plaintiffs' provisional redactions (labeled with the code "ppr") are subject to Plaintiffs' reservation of rights to challenge later. ECF No. 9885.

The Honorable Sarah Netburn June 18, 2024 Page 2

A scanned imprint of each DVD is being filed on the public docket via ECF, accompanied by counsel's contact information in order to facilitate public access. ECF No. 9923.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele
ROBERT T. HAEFELE
28 Bridgeside Boulevard
Mount Pleasant, SC 29465

Tel.: (843) 216-9184

Email: <u>rhaefele@motlevrice.com</u>

For the Plaintiffs' Executive Committee for Personal Injury and Death Claims on behalf of the Plaintiffs

COZEN O'CONNOR

By: <u>/s/ Sean P. Carter</u>
SEAN P. CARTER
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105

Email: scarter1@cozen.com

For the Plaintiffs' Executive Committee for Commercial Claims on behalf of Plaintiffs

KREINDLER & KREINDLER LLP

By: /s/ James Gavin Simpson
JAMES GAVIN SIMPSON
485 Lexington Avenue
New York, New York 10017

Tel.: 212-687-8181

Email: gsimpson@kreindler.com

Attorneys for Ashton Plaintiffs

cc: The Honorable George B. Daniels, via ECF All Counsel of Record via ECF